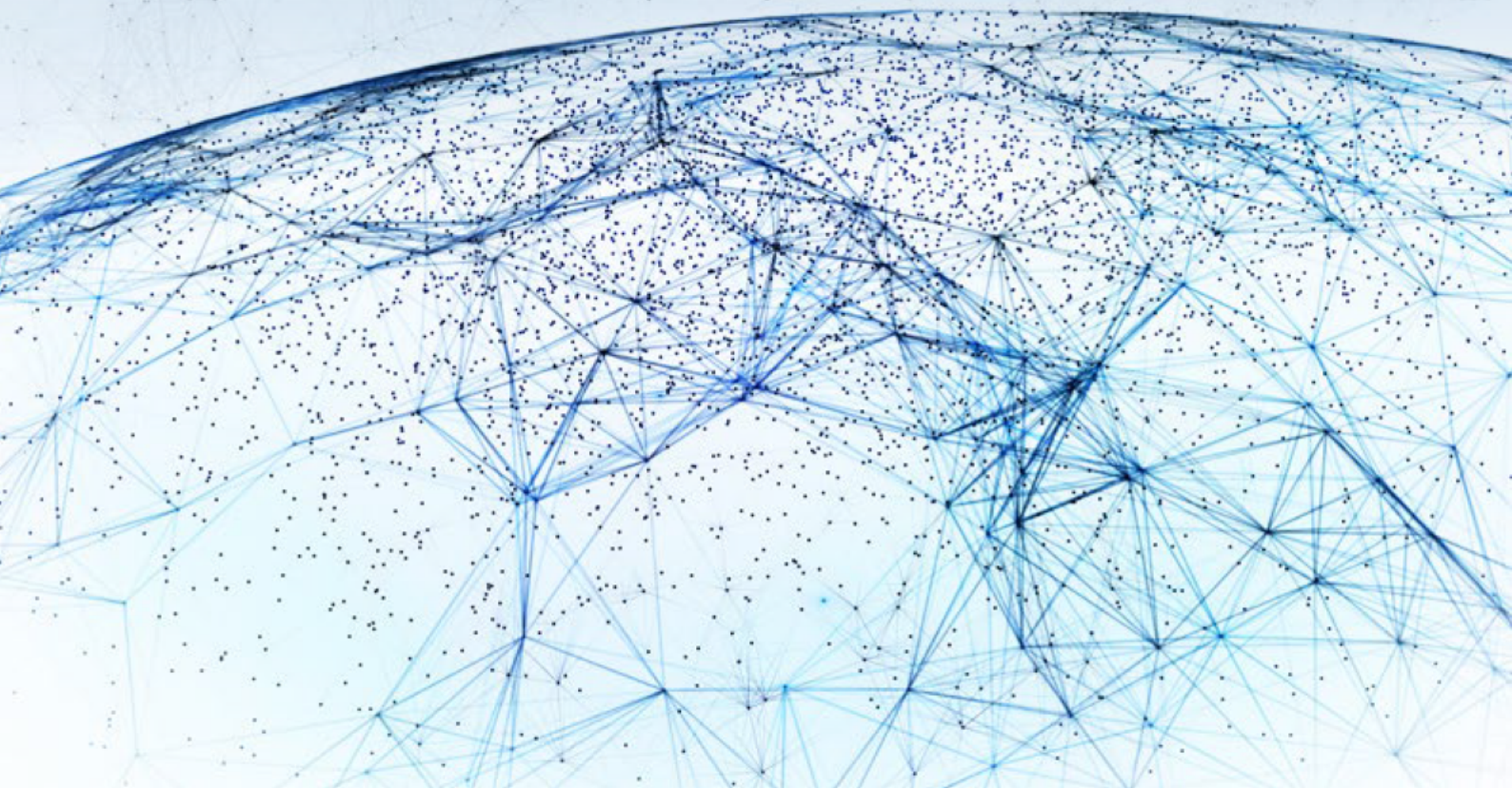




HM Government

# UNITED KINGDOM ANTI-CORRUPTION STRATEGY 2017-2022 **YEAR 1 UPDATE**





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# Foreword

by **Ben Wallace MP**  
**Minister of State for Security and Economic Crime**

I am delighted to introduce this update which sets out UK action over the last year to implement the UK Anti-Corruption Strategy. Corruption and economic crime undermines our economy, damages our international reputation and has a corrosive effect on individuals and communities. 2018 has shown our determination to build on HMG's priority of tackling these threats:

- at our borders – where a corrupt border force official was last month sentenced to more than 23 years in prison for smuggling drugs and fire arms;
- in the actions of corrupt elites – in October the courts overturned the appeal of James Ibori, a former Nigerian State governor convicted of laundering more than £50 million through the City of London, funds that should have provided much needed public services in Nigeria;
- on our television screens – where the TV drama *McMafia* showed graphically that economic crime and corruption are not victimless crimes but rather fuel murder, modern slavery and more; and
- too many organised criminals and money launderers use the UK to enjoy their ill-gotten gains. Their tentacles reach into our property markets, our businesses and sporting institutions. More must be done to tackle those 'facilitators' that allow this to happen.

This Update highlights the Government sustained efforts to tackle corruption particularly through the range and depth of action that has been taken both at home and abroad. Our commitment and effectiveness is demonstrated by the UK's strong performance in the recent independent review of our systems for combatting money laundering and terrorist financing undertaken by the Financial Action Taskforce.

Last month, as the Security and Economic Crime Minister, I launched a Serious and Organised Crime Strategy backed by funding of at least £48 million in 2019 to 2020 to further ramp up law enforcement capabilities in tackling illicit finance. Partnership with business and civil society will be central to success.

I also want to note the establishment in November of the National Economic Crime Centre. This will be the national authority for the UK's operational response to economic crime, maximising the value of intelligence, plus prioritising, tasking and coordinating to ensure our response achieves the greatest impact on the threat.

Looking forward, I am determined to drive the strategy forward to ensure the Government delivers a strong and agile response.

**Ben Wallace, MP**





# Foreword

by **John Penrose MP**  
**the Prime Minister's Anti-Corruption Champion**

My thanks to all the brilliant people across Government and in our various non-Government partner organisations who have worked on the anti-corruption effort to deliver the results described in this report. Tackling corruption doesn't just keep us all safe; it means our economy grows faster, creates a level playing field for our exporters and, as we leave the EU, shows the rest of the world that post-Brexit Britain will remain an open, fair and trusted trading partner in future too.

The anti-corruption strategy boils down to 134 actions, over 5 years. I am particularly pleased that this report includes details of our progress – good or bad – on each one. Transparency is a vital weapon in the anticorruption fight, so we have to keep walking the talk ourselves.

Corruption doesn't stand still, so we will need to update what we're doing as the threat evolves over time. That means signing up more countries to publish fully-transparent registers of beneficial ownership, so there's no hiding-place for dirty money, and supporting British Overseas Territories to do the same; plus deciding whether or when the registers should cover trusts, foundations or real estate as well as shares in companies. It means agreeing how and how fast to improve the quality and reliability of Companies House data, to increase trust in UK firms. Or whether and how to make our public procurement rules simpler and more transparent after Brexit, so taxpayers get better value for money and smaller firms have a better chance of bidding successfully too.

We will need answers to all these questions, and more. And, perhaps, to reset the UK's public anti-corruption debate, which currently focuses more on the extreme wealth and superficial glamour of international money-laundering, at the expense of equally-serious but grittier threats, for example from criminals trying to corrupt public officials or win contracts through bribery. We cannot afford complacency; the price of freedom is eternal vigilance, after all!

**John Penrose, MP**





# Executive Summary

In 2017, we launched a first UK Anti-Corruption Strategy 2017-2022 to provide a framework to guide HM Government anti-corruption policies and actions. This Update highlights the action we have taken since the launch. It details the significant progress we have made across many of our extensive commitments and **demonstrates how we have largely fulfilled** our commitments that were due by the end of 2018.

The Anti-Corruption Strategy aims to support national security, prosperity at home and abroad and public confidence in our institutions. The Strategy is ambitious and this Update shows how in many areas we have **laid the foundations for realising our goals**. It has involved scoping, designing and piloting initiatives, securing funding as well as starting implementation. The impact of these actions will be measured against the overall objective to tackle corruption over the life of the five-year Strategy.

This Update highlights that as we plan for the UK's departure from the European Union we will prioritise strengthening international cooperation and continue to work with partners to bolster global efforts to tackle corruption.

## How have we done?

Of the 134 commitments in the Strategy, 30 contained elements due for completion by the end of 2018. Of these:

- 25 have been **fully completed** and, in some cases, have **exceeded** our original commitment (although three of these were not completed precisely on time);
- Two have been **partially completed** (Commitments 1.2 and 2.9);
- One has been **completed in ways other than originally envisaged** in the Strategy (Commitment 2.2); and
- Two have **not been completed** but work has begun and is on track to be completed by 2019 (Commitments 4.1 and 6.8).

Beyond these, significant progress has been made on our remaining 104 commitments which we **are on track to deliver on time**, including those due in 2019. We will continue to monitor all our commitments, even those which have been fully completed, to review their impact and to strive for continuous improvement throughout the life of the Strategy. We will also adapt to the changing global environment, being agile in our approach to countering corruption beyond the Strategy commitments.

This Update contains details of how we have progressed our commitments in 2018 against each priority area. Specific commitments not mentioned are being progressed and will be reported on in subsequent years. We identify those areas where action was due in 2018 but updates were not available at the time of publication and these will be reported on in the 2019 Update.

Individual HM Government departments are responsible for implementing specific actions. These actions are tracked by the Joint Anti-Corruption Unit and are overseen by the Prime Minister's Anti-Corruption Champion and the Inter-Ministerial Group on Anti-Corruption (IMG). The IMG has approved this Update following consultation across HM Government.

Annexed to this Update is a tracker showing progress against each of the 134 Commitments.

## Strategy overview

International events in 2018 show that citizens value integrity. New governments in South Africa, Malaysia and Pakistan, for example, have been elected with clear anti-corruption mandates and in other countries corruption scandals have made the news. In the UK, the Salisbury poisoning has put a renewed focus on illicit actors and their assets and has provided greater impetus to UK efforts. There is significant international commitment to anti-corruption and the UK remains in the vanguard of these efforts.

## Corruption in the UK

The UK continues to score well in international anti-corruption rankings. The UK has maintained its progression through the Transparency International Corruption Perceptions Index now ranking as the **joint eighth least corrupt country** in 2017. The UK is also rated eighth in the World Economic Forum's Global Competitiveness Index 2018.

Importantly the **UK has a strong track record of implementing its robust legal framework**. Transparency International rated the UK as an 'active enforcer' of its foreign bribery laws in an international comparison and in critical sectors, such as defence, we are recognised as one of the lowest risk countries for corruption.<sup>1</sup>

In 2018 and for the first time in ten years, the Financial Action Task Force (FATF), the international standard setter for anti-money laundering and counter terrorist finance, assessed the UK. It found that we have the strongest controls of any country assessed to date. The report particularly praised the UK for its understanding of the illicit finance threats it faces. It also noted the UK's strong work with international partners to tackle illicit finance, its investigation and prosecution of money laundering, its asset recovery efforts and its global leadership in preventing the misuse of companies and trusts.

In spite of these positive independent assessments, we recognise that there is a great deal more to do. Corruption can undermine confidence in our institutions and our business. Corruption that takes place overseas threatens our security and creates an unequal playing field, putting UK companies at a disadvantage. We will continue to encourage integrity in business, working with international allies and at international fora to raise standards and promote collective action for our strengthened 'integrity offer' for UK businesses engaging in overseas markets.

## Combatting corruption in 2018

This year, in addition to the actions contained in the Priority Reports and the Financial Action Task Force review, we have further strengthened the UK's framework for combatting corruption by 'stress-testing' our systems through international reviews of UK compliance with standards in the UN Convention Against Corruption (UNCAC) Review and whilst we expect positive conclusions, we are already making improvements as needed. We were also reviewed by the Council of Europe Group of States Against Corruption (GRECO) in 2017. We received a positive report and are already implementing the recommendations made.

The Serious Fraud Office's funding model has been reviewed and core funding has increased from £34 million to nearly £53 million per annum. This cost neutral change will enable the SFO to manage its budget more flexibly and efficiently, thereby improving its overall capability to tackle corruption, with a significantly reduced call on the reserve. The SFO will continue to have access to the reserve and Blockbuster funding under the new arrangements.

In November 2018, we launched the Serious and Organised Crime Strategy which highlights that corruption threatens our national security and prosperity, at home and overseas. As part of this, we announced an international illicit finance campaign and an investment of at least £48 million over the next 18 months for a package of capabilities to tackle economic crime and illicit finance, further enabling us to significantly strengthen our approach. In addition, the £45m Prosperity Fund Global Anti-Corruption Programme was approved in October 2018. This four-year programme will work with partner governments to promote inclusive sustainable growth and increase global prosperity through tackling corruption and provides an important mechanism for delivering elements across the Anti-Corruption Strategy and beyond.

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<sup>1</sup> 2018 Transparency International Exporting Corruption report

In December 2017, the Prime Minister wrote to Cabinet colleagues setting out her priorities to progress the government's transparency agenda. New guidelines were published to clarify what core transparency data should be published by central government departments, how frequently, and how to ensure it is available in the most useful format. In support of this agenda, the Cabinet Office has created a central Transparency Data team to oversee the network of transparency leads and publishers across central government departments. The Transparency Data team supports departments as they improve the timeliness, quality and accessibility of Government transparency data publications.

# Review 1

## Reduce the insider threat in high risk domestic sectors

### Goal 1: reduce vulnerability to corrupt insiders in four critical sectors (borders, prisons & probation, policing and defence)

On **policing**, we have strengthened our approach to insider threat by: (a) putting compliance with a national vetting standard on a statutory footing via the College of Policing's Code of Practice; (b) introducing a new Police Barred List to prevent individuals who have been dismissed from re-joining the police service and certain law enforcement bodies in the UK; (c) extending disciplinary proceedings to former officers in the most serious misconduct cases that could lead to dismissal; (d) clarified legislation to support the National Police Chiefs Council's national strategy for preventing and addressing abuse of position by police personnel for sexual gain; and (e) publishing data on each Chief Officer's pay, gifts and hospitality to increase transparency.

Between 15 December 2017, when the Police Barred List was created, and 31 March 2018, 104 individuals were added to the Barred List demonstrating initial impact.<sup>2</sup> Police forces' progress in improving their approach to dealing with the abuse of authority, vetting and the state of their anti-corruption capabilities will be assessed in Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services' annual all-force inspections (known as PEEL assessments) throughout 2019 and beyond. In addition, this year the Independent Police Complaints Commission governance and single line of accountability for investigations was reformed into the Independent Office for Police Conduct which will strengthen the organisation to help it

deliver timely and effective investigations into serious allegations.

HM Prison and Probation Service (HMPPS) has appraised the current approach to tackling corruption in **prisons and probation** and developed a new anti-corruption strategy in line with our established approach to "Pursue, Prevent, Prepare, and Protect". Actions taken to date include restructuring the Counter-Corruption Unit to deliver enhanced support for prisons and probation and enabling more effective gathering, sharing and coordination of intelligence with law enforcement agencies. HMPPS has also developed plans to improve staff capability, including through training, communications and new policy guidance on how to manage corruption vulnerabilities.

On **borders**, we have agreed a programme of work across government to counter the insider threat at UK Ports. This includes work to strengthen information-sharing on those working in sensitive environments in airports to ensure that persons of concern do not have access to restricted environments. We are also piloting initiatives to deny, detect and deter hostile or criminal insider activity at a variety ports.

For the **defence** sector, we have increased our joint working between the Ministry of Defence (MOD), partner agencies, national law enforcement and other policy partners by creating a dedicated post, a Single Point of Entry, who now acts as the primary communication channel between the MOD and its partners. This dedicated resource informs the effective tasking of assets and allows for enhanced co-ordination of intelligence-led operations against threat actors by identifying and progressing investigative leads. This has also increased joint working with other parts of the MOD and police partners for routine information purposes.

<sup>2</sup> As per College of Policing statistics

We are further able to deter, disrupt and detect insider threats having improved oversight of insider threat activity within the Terrorism, Espionage, Sabotage, Subversion and Organised Crime (TESSOC) spectrum and the management of investigations across the MOD. A programme of enhanced data analytics to support this will be progressively rolled out in September 2019.

## **Goal 2: increased awareness of the insider threat across sectors**

We are providing best practice advice on personnel security and tackling insider threat through the Centre for Protection of National Infrastructure (CPNI). CPNI has developed and tested over 100 guidance products which it delivers across seven core elements of personnel security to help organisations develop insider risk programmes and create consistency of approach across sectors. This advice is provided to its approximately 3,000 members across 842 organisations in 13 critical sectors. We will work with CPNI and the National Cyber Security Centre to continue targeting the bodies critical to national infrastructure, both in the public and private sector and ensure they are guided to the advice and adapting their organisational culture accordingly.

## **Conclusion**

In 2018 we have begun to introduce specific measures across the 4P approach (Prevent, Protect, Pursue and Prepare) against those seeking to abuse their positions in the four critical areas. We are developing further actions through piloting initiatives and implementing new strategies, the impact of which we will assess over the life of the Anti-Corruption Strategy. We will continue to take a strategic approach to common risks and vulnerabilities across the four sectors as well as exploring options for a favourable outcome at the upcoming Spending Review.

In providing CPNI advice, we are also ensuring that organisations critical to national infrastructure have the understanding and tools they need to recognise and mitigate insider threat risks.

Our actions are geared towards reducing the opportunities for corrupt insiders to operate and exploit weaknesses in high risk sectors and build greater confidence in our priority institutions and sectors.

# Review 2

## The UK as an international finance centre

### Goal 1: greater transparency over who owns and controls companies and other legal entities

The Registration of Overseas Entities Bill was published in draft in July 2018. The Bill will establish a **public register of beneficial ownership** of overseas legal entities owning UK property. The Bill has been subject to pre-legislative scrutiny and is due to be introduced to Parliament in 2019, with a view to establishing the register in 2021. In addition, the government will use existing transparency mechanisms to publish beneficial ownership information for foreign companies winning government contracts.

In October 2018, the Anti-Corruption Champion John Penrose MP led the UK delegation at the International Anti-Corruption Conference in Copenhagen where he announced an **international beneficial ownership transparency campaign** to shift global norms by 2023 and called on countries and international organisations to join us, including by establishing public company beneficial ownership registers.

We will implement the measures of the Sanctions and Anti-Money Laundering Act 2018 in relation to publicly accessible registers of company beneficial ownership in the **UK Overseas Territories**. A **review of existing arrangements for sharing Overseas Territories' company beneficial ownership information** with UK law enforcement authorities was published in May 2018 and found that the systems were working effectively. A statutory review of these exchange of information procedures will follow in 2019.

To increase transparency through **improved communications between Companies House and law enforcement agencies**, regular dialogue between Companies House and law enforcement agencies routinely takes place. Companies House has actively sought to increase awareness in law enforcement agencies on how the People with Significant Control (PSC) Register information can assist them. This has seen enquiries for help in investigations increase from an average of 11 requests per month to 125 per month in the last three years. As a result of these efforts, in 2017/18 police and NCA requests to Companies House for information has more than doubled. In addition, the PSC Register continues to gather company beneficial ownership information. The register was accessed over two billion times in 2017.

### Goal 2: stronger law enforcement, prosecutorial and criminal justice action

A multi-agency team (including the National Crime Agency, the Financial Conduct Authority, HM Revenue and Customs (HMRC), City of London Police, Crown Prosecution Service, Home Office and the Serious Fraud Office) is designing and building the new **National Economic Crime Centre (NECC)**. The NECC's initial capabilities started in October 2018 and will develop and evolve throughout 2019 and beyond. The expansion of the NECC is being achieved through a phased build and the launch plan reflects that both personnel and capabilities will increase over time. A new Director General post to lead the NECC is expected to be appointed in the first quarter of 2019.

A new ministerial role of Security and **Economic Crime Minister** has been created. Additionally, a new **Ministerial Economic Crime Strategic Board** has been established which will drive the response to economic crime, agree strategic priorities and scrutinise

overall performance and impact against economic crime. It will be jointly chaired by the Home Secretary and the Chancellor and will have representatives from across the public and private sectors. Also improving the governance of the economic crime response is a **new Economic Crime Delivery Board**. Chaired by the Home Office Permanent Secretary and the second Permanent Secretary to HM Treasury, this Board comprises senior officials across Whitehall and agencies playing a key role in tackling economic crime. This Board has met regularly in 2018 and is responsible for overseeing the delivery of the programme of activity in this space.

The **Unexplained Wealth Order**, a key element of the Criminal Finances Act (CFA) 2017, came into effect in 2018 for all parts of the UK except Northern Ireland<sup>3</sup> (see Case Study 1). The CFA also introduced a new account freezing and forfeiture order and the ability to seize and forfeit certain personal or moveable property such as precious metals and watches. Over £22m has been frozen since they were introduced in January 2018.

We have also worked with international partners to build up **the International Anti-Corruption Co-ordination Centre** with nine agencies from different jurisdictions<sup>4</sup> coordinating the global law enforcement response to corruption and supporting affected states. As a result, 11 investigations have been progressed and, in one case, supported the arrest of a senior overseas government official suspected of corruption.

HM Government's response to the **Call for Evidence on Corporate Criminal liability** for Economic Crime will be published in 2019. Work is continuing on analysis of the evidence and future options.

The **City of London Police has developed and delivered the new learning programme** which is designed to reflect the crime trends and challenges faced by those investigating

bribery. This programme has been delivered across HM Government Law Enforcement and to representatives of the International Bribery Taskforce representing the USA Federal Bureau of Investigation, Australian Federal Police and Canadian Royal Mounted Police.

### Goal 3: further enhance anti-money laundering and counter-terrorist financing capabilities

The **Office for Professional Body Anti-Money Laundering Supervision (OPBAS)** has been fully operational as of January 2018. It aims to ensure that professional body anti-money laundering supervisors are working to the high standards required of them under the Money Laundering Regulations. By early 2019, OPBAS will have completed its supervisory assessments of all bodies and has already begun to address gaps in intelligence sharing.

### Goal 4: strong public-private partnerships, to share information and improve targeting of those who pose greatest risk

We have established a three to five-year programme to make the **Suspicious Activity Reports** regime more efficient and effective. A joint public/private programme team has been set up to improve reporting, enhance utilisation of reports by law enforcement and strengthen feedback systems to maintain effectiveness.

In 2018 we delivered the **Flag It Up anti-money laundering campaign** to the legal and accountancy professions to help prevent their witting or unwitting involvement in money laundering. Professionals surveyed who were aware of the campaign were twice as likely to have submitted a Suspicious Activity Report. In October 2018 the campaign was expanded to include the property sector.

<sup>3</sup> This is a devolved power and in the continued absence of the Northern Ireland Assembly, we have secured new legislation to give greater clarity and certainty to enable Northern Ireland Departments to continue to take decisions in the public interest. We are carefully considering, with the Department of Justice Northern Ireland, how UWOs can be made available in Northern Ireland given the continuing absence of an Assembly.

<sup>4</sup> UK National Crime Agency (NCA), US Federal Bureau of Investigations, US Homeland Security, Australian Federal Police, New Zealand Police, New Zealand Serious Fraud Office, Royal Canadian Mounted Police, Singapore Corrupt Practises Investigations Bureau, Interpol.

The **Joint Money Laundering Intelligence Taskforce (JMLIT)** has assisted law enforcement on over 500 cases and has produced over 35<sup>5</sup> alerts which have been shared across the whole financial sector to enhance awareness of financial crime risk and improve mitigation strategies. This year the JMLIT launched 'Project Athena' to enhance its analytical capability for investigating complex financial crime. The Taskforce is working to incorporate this model into its "business as usual" operating model and it has enhanced its core operations group.

As part of the Serious and Organised Crime Strategy launched in November 2018, we will deliver a comprehensive international illicit finance campaign, designed to protect our people, prosperity and global influence by **strengthening the global response to illicit finance**. We will seek to maintain, strengthen and ensure implementation of international standards, regulations and norms. This will involve pushing for targeted changes to the FATF standards where necessary. It will also involve using multilateral fora (such as the Organisation for Economic Co-operation and Development, G7 and G20) to drive delivery of existing international standards, particularly on tax transparency, beneficial ownership, asset recovery, anti-money laundering and counter-terrorist financing.

## Case Study 1:

### Unexplained Wealth Orders

In January 2018, "unexplained wealth orders" (UWO) commenced (except in Northern Ireland). A UWO requires a person who is politically exposed or is reasonably suspected of involvement in, or of being connected to a person involved in, serious crime to explain the nature and extent of their interest in particular assets, and to explain how these were obtained. It requires the respondent to provide information on certain matters (their lawful ownership of a particular asset, and the means by which it was obtained).

In February 2018, the National Crime Agency (NCA) secured the first UWOs in relation to two properties worth more than £22m which are linked to a PEP. The High Court rejected an appeal to dismiss the UWO in October 2018.

To date three UWOs have been granted since the powers were introduced.

## Conclusion

The integrity of the UK as a global financial centre is essential to our long-term reputation and prosperity, especially as we become an independent trading nation. The international illicit finance campaign, strengthened law enforcement action, such as unexplained wealth orders, and improved governance will make the UK more hostile to illicit finance. Increasing transparency internationally through the beneficial ownership transparency campaign will both aid law enforcement and help companies to carry out business with integrity, this will also attract high-quality investment to the UK as we are increasingly seen to be a reputable place to do business.

5 As per NCA statistics



# Review 3

## Promote integrity across the public and private sector

### Goal 1: greater public sector resilience against the threat of corruption

In October 2018, we launched the **Counter Fraud Profession**. Five of the ten planned disciplines have been developed and two are operational. The profession already has over 3,000 members. The Profession is a structure for practitioners across counter fraud, anti-corruption and economic crime working in central government to ensure they have the necessary skills to identify and mitigate the risks of internal bribery and corruption. Members will have access to resources with a focus on investigation and new areas of risk assessment, prevention and the use of data analytics. The bribery and corruption discipline has been developed.

The **Government Standards for Counter Fraud, Bribery and Corruption** were published in October 2018. The Standards establish the core components that a government organisation should have to effectively help protect it from fraud, bribery and corruption. Annual reporting on which departments are following these Standards will commence in 2019. In December 2018, a report on the fraud in central government will be published (these details are not available at the time of publication of this Update).

We have successfully completed pilots on **joint investigative arrangements between the Department for Work and Pensions (DWP) and local government**. DWP is currently rolling out this initiative with over 200 local councils across the UK.

Voter identification was successfully tested by five local authorities at the 2018 local elections along with measures to improve the integrity of the postal and proxy vote process. Twelve local authorities are taking part in further testing of the impact of voter identification at the 2019 local elections and postal and proxy voting measures will also be tested. The pilots will provide further insight into ensuring the security of the voting process.

### Goal 2: a more open government that is trusted by citizens with robust protection for whistleblowers

In July 2018, we implemented the revised **Freedom of Information Act Code of Practice** which aims to improve understanding of best practice for all public authorities and bodies responding to freedom of information requests.

The Department for Business, Energy and Industrial Strategy (BEIS) completed a review of the effectiveness of its **Whistleblowing Guidance for Employers and Code of Practice**. The response rate from business was insufficient to reach conclusions. BEIS will now include this in its wider **2018/19 review of the changes to the whistleblowing framework as introduced by the Enterprise and Regulatory Reform Act 2013**. Consultations targeted at key industry professionals for this review will commence by the end of 2019.

The Employment Rights Act 1996 (NHS Recruitment – Protected Disclosure Regulations 2018) came into force in May 2018. These are designed to **protect previous whistleblowers seeking new employment opportunities** in the NHS from being discriminated against.

### Goal 3: strengthening UK private sector integrity

The results of the **review of the Security Industry Authority (SIA)** were published in June 2018. The review concluded that the SIA operates effectively in regulating the private security industry and made recommendations to improve standards. These are now being considered.

### Goal 4: greater integrity in domestic and international sport

We continue to support the **International Partnership Against Corruption in Sport (IPACS)** and hosted a meeting in December 2018. IPACS is notable for being the only international sporting governance initiative which is a partnership of governments, multi-national organisation and major world sporting bodies. Three taskforces have been established: (a) corruption in public procurement for major sporting events, (b) corruption in the awarding processes of major sporting events and (c) convergence of good governance frameworks. A remaining challenge is securing funding and resources for the governance of IPACS. All parties are mindful of imposing inappropriate measures on sporting bodies that are then ineffective. The UK signed the **Council of Europe Convention on the Manipulation of Sports Competitions in 2018** at the December IPACS meeting.

The **tailored review of UK Anti-Doping** was published in 2018, and a number of recommendations on good governance were made and are being worked through.

## Conclusion

Promoting integrity across the public and private sectors is essential to ensuring that our organisations are less prone to corruption and deliver better services. In setting up the Counter Fraud Profession and introducing measures such as the new standards for counter fraud, bribery and corruption, we are increasing the knowledge and skills of those working in the public sector to detect, prevent and mitigate the risks of corruption. In strengthening protections for whistleblowers we are helping to create a culture across the public and private sectors that is more trusted by our citizens.

In sport, our work in 2018 recognises that national governments have an important role in combatting corruption and ensures that the UK is at the heart of international efforts.

As with much of our work throughout 2018, it will take time to embed these new efforts and initiatives and assess their effectiveness in helping our citizens have more confidence that these organisations are serving their interests.

# Review 4

## Reduce corruption in public procurement and grants

### Goal 1: greater procurement transparency, enabling better identification and mitigation of corruption risks

To ensure that **more public bodies fulfil their transparency obligations** we published a Procurement Policy Note providing updated guidance on transparency and publication of tender and contract documents. This has resulted in a 31 per cent increase in the number of notices being published on Contracts Finder between November 2017-October 2018.

Through the Prosperity Fund Global Anti-Corruption Programme, we are sharing **our expertise for the digital transformation** of government procurement services with partner countries. In 2018 we undertook scoping work in six emerging market countries<sup>6</sup> (exceeding the original target of four) with inception visits and design discovery phases planned in 2019. These aim to increase transparency, accountability and efficiency through capability building and technology. We have also updated Contracts Finder to enable publication of supplier, Companies House and UK Charities numbers on award notices.

In 2017 we **hosted a conference** for key MOD strategic suppliers as part of a programme which aims to **entrench a strong anti-corruption culture** by sharing insights on fraud and corruption challenges and identifying ways the Defence Industry and the MoD can work together to reduce fraud and corruption in the supply chain. In 2018, we brought together the Defence Industry,

NATO and other partner nations to host a similar conference, launching the NATO Building Integrity Public Private Partnership. Outputs from these ongoing programmes will be considered in 2019 and beyond.

We **worked with international partners through the Contracting 5**<sup>7</sup> to establish the joint working group in December 2017. The working group promotes open data to improve public procurement and achieve better value for money; a fairer and more competitive business environment; better goods and services; and reduced corruption in public contracting.

We have started a **review of the procurement risks in local government**. Terms of reference have been agreed, and evidence gathering work has begun including consultations with stakeholders. The review is expected to be completed in mid-2019, after the original deadline.

In addition to our Strategy commitments, in the autumn of 2018 we publicly consulted on the **fourth Open Government Partnership National Action Plan** which includes draft commitments to further transparency in government contracting.

### Goal 2: strengthened awareness and capability within contracting authorities

In June 2018 we explored developing a unique identifier for governments grants data. This work is ongoing. We have secured funding to explore new technology (or adapt existing technology) to develop unique identifiers. In addition, we have published grants data to open data standards<sup>8</sup> and rolled out a visualisation dashboard for the data to improve accessibility. Data for 2017/2018 has been published and we will

6 Mexico Colombia, Malaysia, South Africa, Botswana and Indonesia

7 Colombia, France, Mexico, the Ukraine and UK are the founder members of the Contracting 5, with Argentina joining in 2017

8 360 Giving Standard

continue to publish data for subsequent years on an annual basis. We will consider how unique identifiers might be implemented for the next publication in autumn 2019.

The **National Fraud Initiative (NFI)** has saved over £300m of UK taxpayers' money from fraud in the last two years. In August 2018, we published its national report and launched the NFI four-year strategy. The strategy outlines how the NFI will seek to embrace technology and data to better target evolving fraud risks in local authorities. In 2019 work will continue to progress the strategy, including with the Scottish Government and Audit Scotland to develop a package of new options for local authorities, and with HMRC to progress the introduction of relevant data into the NFI.

The **Competition and Markets Authority (CMA) cartel designed tool** which analyses procurement data for signs of cartel behaviour has been accessed by nearly 200 organisations, including 16 governments departments and 36 local authorities. Departments reported they were prevented from effectively using the software due to a lack of understanding on how the tool worked and concerns over software security. CMA is reviewing its approach with recommendations expected in 2019.

### **Goal 3: greater confidence in efficient and legitimate contract management**

In June 2018, we successfully completed a Contract Debarment trial of additional conviction checks for bidders. The results of the trial are being analysed and a preferred approach will be set out in 2019.

We are producing specific guidance on how to apply exclusions in procurement, to assist procurers in tackling corruption, managing conflicts of interest and whistleblowing. It is due to be published December 2018, later than originally targeted.

## **Conclusion**

Reducing corruption in public procurement and grants helps ensure better use of tax payer money to deliver better services and gives greater public confidence in our institutions. Initiatives like the Cabinet Office guidance and stepping up our own transparency efforts are designed to help us better identify and mitigate corruption risks. Collaborating with partner countries and sharing expertise to improve procurement services is helping to create an “open by default” culture in public contracting at home and internationally.

Encouraging new behaviours and practices on public procurement takes time and we recognise that, as many of the procurement regulations are set by the EU, the priority for procurement stakeholders will be to focus on managing the transition. We will nevertheless continue to strive to fulfil our Strategy commitments and assess the impact of our actions.

# Review 5

## Improve the business environment globally

### Goal 1: reduced impact of corruption on trade and investment internationally

The Anti-Corruption Strategy commits the UK to **support other countries to actively implement international Anti-Corruption standards**. This is achieved by ongoing **bilateral and multi lateral engagement with international partners and active participation at global fora**, including through the **OECD Anti-Corruption Convention**.

In addition, the **OECD Global Anti-Corruption and Integrity Forum** was held in March 2018 with attendees from over 120 countries. The Forum, which was majority funded through our Prosperity Fund, considered how integrity cultivates a level playing field for business, reduces socio-economic inequalities and makes public policies more effective. The Forum also focused on governance and its role in curbing corruption and unethical practices in areas such as trade, competition, infrastructure, development co-operation and revenue collection. The new *OECD Strategic Approach to Combatting and Promoting Integrity* was launched at the Forum (see *Case Study 2*) and an online hub and toolkit for auditors was announced.

We worked with **partners in the G20 Anti-Corruption Working Group** to negotiate and publish a set of *High-Level Principles on Preventing Corruption and Ensuring Integrity in State-Owned Enterprises* (SOEs). These Principles are designed to set out G20 consensus on key anti-corruption issues, provide a blueprint for G20 countries to use to encourage others to change their behaviour, provide a mechanism for G20 leaders to endorse anti-corruption initiatives and drive

high level political momentum. Addressing corruption and boosting integrity standards in SOEs will strengthen the global business environment, reduce the impact of corruption on international trade and could help to reduce global bribery levels.

As we prepare to become an independent trading nation following our exit from the EU in March 2019, **we are actively considering how transparency and anti-corruption can best be supported through trade dialogues and agreements**. We have completed a public consultation on possible free trade agreements (FTAs) with the USA, Australia and New Zealand, which will help inform thinking on whether FTAs are an appropriate vehicle to promote integrity standards. This consultation closed in October 2018 and we are reviewing the responses, with a final position expected in early 2019.

### Goal 2: enhanced international development finance and export finance practices

UK Export Finance, the UK's export credit agency, has been working closely with like-minded export credit agencies on a new **OECD Recommendation on Bribery and Officially Supported Export Credits** to promote **higher standards of anti-bribery due diligence**, particularly in relation to enhanced due diligence on agents and agents' commission and has taken a lead role in respect of this issue at the OECD. The OECD Export Credits Group has agreed the text of the new Recommendation and will now forward the text to the OECD Council for formal adoption. This is expected to happen in early 2019.

Both CDC, the UK's development finance institution, and UKEF have **strengthened and expanded** the capacity and resources available to their internal due diligence teams. (see *Case Study 3 on UKEF's financial crime compliance review*). CDC has also **increased its transparency** by launching a new website

containing more information on its investments. It also undertakes annual reviews to ensure its tax policy keeps pace with evolving international standards.

### Goal 3: increased investment with integrity by UK companies in challenging overseas markets

In August 2018, the Prime Minister announced an initiative to **strengthen support to UK companies** so that they can operate and succeed with integrity. This Business Integrity Initiative (BII) is a joint Department for International Development (DFID), Department for International Trade (DIT) and the Foreign and Commonwealth Office (FCO) initiative designed to provide **new practical guidance** to help companies overcome barriers to doing business in frontier markets, including guidance on dealing with requests for bribes and human rights issues in supply chains, with tailored support offered to SMEs. In 2018, implementation of BII involved:

- the creation of a new Business Integrity Hub to carry out a cross-HMG coordination function and provide a signposting mechanism for companies looking for support on business integrity. The Hub is now fully staffed and guidance services on compliance, prevention and collective actions for SMEs went live in November; and
- beginning work on three country pilots in Kenya, Pakistan and Mexico, designed to increase the systematised business integrity offer from UK missions.

In addition, practical information on integrity considerations when doing business overseas is available on [great.gov.uk](https://www.gov.uk/great), the digital platform of DIT. DFID, DIT, FCO, UKEF and SFO have also updated wording on their respective websites for better coherence and to emphasize the benefits of business integrity, as well as the risks of corruption. This will all contribute to more businesses operating with integrity, leading to reduced corruption, increased and more sustainable trade and investment and an enhanced UK reputation.

## Case Study 2:

### OECD Strategic Approach to Combatting and Promoting Integrity

At the OECD Global Integrity Forum, the Prime Minister's Anti-Corruption Champion John Penrose MP and the OECD General Secretary Angel Gurría released the OECD Strategic Approach to Combatting Corruption and Promoting Integrity. This Strategy sets out the OECD's commitment to:

- Conduct more evidence-based analysis;
- Break down siloes between areas of expertise;
- Continue to expand the global application and implementation of standards;
- Explore the application of OECD standards at local government and sectoral levels; and
- Strengthen engagement with non-government stakeholders

In part-funding this Strategy, we are demonstrating HM Government's commitment to support other countries in implementing their international commitments, in particular the OECD Anti-Bribery Convention, we are also helping create a level playing field in which UK businesses can compete on level terms.

## Case Study 3:

### **UK Export Finance's Financial Crime Compliance review**

In 2017, UK Export Finance (UKEF), the UK's export credit agency, commissioned external consultants to review the department's policies and procedures in relation to financial crime compliance and operational structures. This included considering how best to establish a dedicated and independent due diligence unit. This review was a key UKEF commitment in the Anti-Corruption Strategy.

The review has considered UKEF's legal and regulatory landscape, and has made recommendations for UKEF's policies and procedures, based on international best practice and process efficiencies through the use of technology.

Results to date have included: the agreement of UKEF's risk appetite, proportionate to the risks faced by the department; an improved process for reporting business conduct concerns to law enforcement; and an enhanced compliance team headed by an experienced professional to bring expertise and embed good practice. UKEF will implement agreed recommendations, including the establishment of a dedicated anti-bribery and corruption due diligence team throughout 2018 and 2019, supported by ongoing monitoring.

This is an example of how HM Government is dedicated to building resilient internal organisations and strengthening its professional integrity while demonstrating the commitment across Government to combatting corruption.

## Conclusion

Our active participation in the various international fora and the Prosperity Fund initiatives help us work with partners to secure improved business environments internationally while we are continuing to support the development of international best practice on transparency and strengthened standards on integrity. The Bill is strengthening our support for UK companies to give them greater opportunities to export to various markets with integrity while helping them navigate the complexities of compliance regimes.

Brexit gives us the unique opportunity to position ourselves as a place to do business with integrity and in 2018 we have worked to strengthen our international standing in this area. Our long-term goals are to encourage open and competitive trade and investment and this year we have laid the foundations to achieve these.

# Review 6

## Work with other countries to combat corruption

### Goal 1: reduced impact of corruption on trade and investment internationally

In December 2017, we co-hosted the Global Forum on Asset Recovery, which introduced principles for transparent and accountable asset return to ensure the safe **return of recovered stolen public assets** in ways that guard against their further corruption and encourage their use for social and economic development. In 2018 the UN began incorporating these principles into its UN Convention Against Corruption (UNCAC) experts' working group that is examining the scope for agreeing a global set of principles for all those involved in asset return.

We are **supporting countries to implement their commitments arising from the London Anti-Corruption Summit in 2016 on company beneficial ownership transparency**. Through DFID's International Action Against Corruption programme we are supporting Open Ownership in making it simpler to publish and access high-quality data about who owns and benefits from company ownership on its global Open Ownership Register. The Register contains entries for around 4.8 million companies. Through our support of Open Ownership, we are also directly **assisting countries that are developing new national public registers of company beneficial ownership**, for example the Nigerian Senate has recently passed legislation requiring beneficial ownership data to be in their companies register and intends to publish this information.

We are providing financial support to the International Budget Partnership (IBP) as it promotes budget transparency and the uptake of information by those holding governments to account in developing countries.

Through IBP we aim to support **15 additional developing countries to achieve a measurable improvement in their level of fiscal transparency, accountability and citizen participation by 2020**. Work is underway in South Africa, India and Kenya and an inception phase has started in Nigeria.

We are progressing our commitment to support **16 countries to implement more open contracting in public procurement by 2020** supported by DFID's Fiscal Accountability, Sustainability and Transparency programme. In addition, through the Prosperity Fund we are also supporting the Open Contracting Partnership to reduce susceptibility to corruption and making it easier for businesses to compete fairly.

We are providing financial and technical support to the Extractive Industries Transparency Initiative (EITI) which aims to improve transparency in the extractives sector including on beneficial ownership. In June 2018 we published a **Post Implementation Review (PIR) of The Reports on Payments to Governments Regulations 2014**. Findings confirmed that the Regulations had achieved success criteria in terms of greater levels of transparency, good compliance levels and avoidance of unnecessary costs to business.

We have worked with partners, including the OECD and the Natural Resource Governance Institute (NRGI) to **strengthen transparency in the sale by producer governments of oil and gas minerals**. We have built on work with the international Thematic Dialogue on Commodity Trading Transparency and the OECD Development Centre to collectively identify practical steps to address existing transparency and accountancy gaps. These steps include developing a global reporting template for payment disclosure by companies



involved in commodity trading and a template to support state-owned enterprises in selecting buyers with the aim of strengthening transparency over the coming years.

We have collaborated with Pakistan to pilot **the Common Reporting Standard (CRS)**, an operative system for automatic exchange of information run by the OECD. This pilot successfully put in place the legal, treaty, security, IT and operational framework for the Federal Board of Revenue in Pakistan **to automatically receive financial reporting accounts** of Pakistani citizens from over 100 countries. Pakistan undertook the first reciprocal exchange of information on the CRS system in September 2018. Similar work is progressing in Ghana, which has established the necessary legal and treaty frameworks.

## Goal 2: reduced levels of corruption in partner countries

Our plans to pilot a strengthened “**whole of UK Government**” strategic approach to anti-corruption in selected countries by December 2018 has evolved since the Anti-Corruption Strategy was launched. The original aim was to explore how a cross government effort could better leverage its influence and activities in given jurisdictions to promote stronger anti-corruption outcomes. In 2018 we are rolling out a package of analysis, personnel and co-ordination mechanisms as part of a cross government effort to tackle serious and organised crime in priority jurisdictions. This provides a strong vehicle for our anti-corruption efforts. This platform was launched in 2018 as part of the Serious and Organised Crime Strategy and is already providing a cross government perspective on serious and organised crime at a country level.

This year we became the first and to date only country in the world to introduce **new principles on governing compensation to overseas victims** of bribery, corruption and other economic crimes (see *Case Study 4*).

In an example of our innovative approach to combating corruption, we conceived, spearheaded and funded the newly created **Financial Intelligence Unit Excellence and Leadership Centre under the Egmont Group**, the global representative body of Financial Intelligence Units, which opened in April 2018. This new unit will strengthen the capacity of financial intelligence units, particularly in developing countries, to identify and address possible corruption and money laundering risks and enhance their prevention systems.

## Goal 3: enhanced action to reduce corruption in fragile and conflicted affected states

We have continued to support the NGO Transparency International’s UK Defence and Security programme. This programme raises awareness by producing the Government Defence Index and works with defence ministries to tackle corruption and increase civilian oversight. In addition, on an intergovernmental basis and through regional partnerships the **Building Integrity UK** programme from the UK’s Defence Academy continued deploying a cadre of defence and security experts to provide NATO and EU certified training and advice on managing corruption risks in defence institutions and in complex security environments. Both areas will be built on in 2019.

We are promoting **stronger capabilities to combat corruption in the defence and security sectors** in a number of countries. In 2018 the Building Integrity UK programme delivered 25 separate capacity building events to 700 defence and security officials from 51 countries. In addition, as part of a tested capacity building model we have trained instructors in Afghanistan, Colombia, Ukraine, Macedonia, Albania, Montenegro, the Occupied Palestinian Territories and Jordan.

## Case Study 4:

### **Civil Recovery Order involving Chad.**

In 2018 we introduced the Compensation Principles Agreement between the Crown Prosecution Service, the National Crime Agency and the Serious Fraud Office (SFO). This establishes a common framework to identify cases where compensation is appropriate and to ensure swift action in such cases to return funds to the affected countries, companies or people.

Under these principles we have committed to ensuring that the question of compensation is considered in every case and to using the available legal mechanism to secure compensation whenever appropriate. We have also committed to working collaboratively across Government to identify potential victims and utilise suitable means to return money in a manner that minimises the risk of re-corruption.

This year, the SFO successfully obtained a civil recovery order to the value of £4.4m which represented the proceeds of corrupt deals in Chad. Subject to a potential appeal, DFID, which is already investing in humanitarian programmes in Chad, is looking at how the money can best be returned for the benefit of the people of Chad.

## Conclusion

Corruption is best combatted through international coordination and cooperation and we continue to lead the way in providing our support, expertise and advice to international partners in particular through the Building Integrity UK programme and the leadership centre at the Egmont Group. Our work in 2018 with the likes of Open Ownership, NREGI, IBP and EITI is designed to enhance international transparency, especially in beneficial ownership, extractives, public finance and contracting. This aims to ensure that there is greater use of information to deter, identify, track and prosecute corruption with the long-term goal of promoting stability and prosperity both in the UK and internationally.

# Other Strategy commitments

Beyond the six priority areas, the Anti-Corruption Strategy focused on building a sound understanding of the nature of corruption, effective partnerships and strong international engagement. This section assesses progress against commitments not addressed elsewhere in this Update.

## Improving our understanding of corruption

- For the first time we have started publishing data on a quarterly basis on how many **reports of corruption have been made to the police** in England & Wales. This data will be used to improve recording of corruption;
- The Counter Fraud Profession will help develop our understanding of the nature of **corruption within government**. For the first-time departments started this year to report against the corruption risk assessment templates developed under the 2014 Anti-Corruption Plan;
- The DFID Anti-Corruption Evidence Programme issued new calls for proposals in December 2017 to develop further research into **international corruption**; and
- The **International Monetary Fund (IMF)** has used DFID funding to extend its Debt, Investment & Growth Assessments to capture corruption, which will now form a core part of their method for enhanced engagement with countries on corruption issues.

## Working Together

- The **Prime Minister's Anti-Corruption Champion** engages with a range of external partners on a regular basis. For example, in 2018 he has held roundtables with business and civil society and met e-procurement platform providers to understand the nature of internal checks companies undertake to assess corruption risks in procurement. His international commitments include representing HM government at the OECD Integrity Forum in Paris in March and at the International Anti-Corruption Conference in Copenhagen in October. He has also delivered a number of speeches at events in the UK. The Champion has also met with ministers and representatives from governments around the world as well as international organisations to discuss collaboration on anti-corruption issues. He actively engages with his parliamentary colleagues and in July 2018 gave evidence to the House of Lords Select Committee on the Bribery Act;
- A number of departments and agencies regularly liaise with **civil society organisations**. Civil society participated in the UK's second cycle review under UNCAC, meeting the review team and providing a written submission. CSOs have been actively engaged with the development of a fourth UK Nation Action Plan under the Open Government Partnership. CSOs also implement UK development programmes to promote transparency and fight corruption at the global and national levels;
- We have strengthened our **public-private partnership** commitment in relation to SARs and JMLIT as set out in Review 2; and

- We have reviewed **options to develop and promote innovative approaches to combat corruption** and in spring 2018 consulted with a range of stakeholders to undertake mapping of the existing landscape. We judged that there was not a compelling case for establishing a standalone initiative in this space at that time. More broadly we continue to promote **innovative** ways of working, as shown in the leadership centre at the Egmont Group which was conceived and driven by us. We will continue to promote new and innovative ways to tackle corruption, including through using new technology.

### Promoting international standards and partnerships

- We have actively engaged with the formal reviews of the UK by **UNCAC, FATF and GRECO**. For the onsite portion of the UNCAC Review we worked together with the Crown Dependencies and the British Virgin Islands as well as civil society to consider the UK's anti-corruption framework.
- We are following up on the recommendations of the OECD Phase 4 evaluation on our implementation of the **OECD Anti-Bribery Convention**. We will report back to the Working Group on Bribery on progress in March 2019.
- With UK Prosperity Fund support, UNODC has implemented a programme to promote **implementation of the United Nations Convention Against Corruption** at a country and regional level. Work include whistle blowing recommendations and legislation for five countries in East Africa to improve procurement practice and financial investigation.
- The IMF Executive Board approved the **new Framework for Enhanced Engagement on Governance** in 2018. The UK is among a group of countries which have volunteered to include a new section on anti-corruption added to their Article IV assessment. This will consider foreign bribery and money laundering as risks to macro-economic stability.
- At the 2018 **Commonwealth Summit in London**, we hosted an event on anti-money laundering and de-risking of banks.

### Reporting and monitoring progress

- This Update is the annual written update to Parliament provided for under paragraph 10.2 of the Strategy. It has also been uploaded to the GOV.UK website.

### International leadership

- The UK has continued to promote international anti-corruption efforts, championing international standards and working directly with other countries. In addition, we:
  - hosted the Western Balkans Summit, which brought together the leaders of the Western Balkans countries and other European partners to strengthen security co-operation, increase economic stability and encourage political co-operation. Five of the six countries made public anti-corruption commitments;
  - established the International Public Sector Fraud Forum which is designed to expand, share and develop best practice on fighting fraud and corruption in the public sector;
  - hosted an international conference on the Illegal Wildlife Trade in London attended by over 1,000 people including heads of state and ministers from 62 countries. Tackling corruption was one of the core themes.

# Forward look to 2019

2018 has been primarily about laying the groundwork for the action we are planning to take, as is appropriate for the first year of a five-year strategy. Work has been scoped, operational and delivery plans devised, resources secured, infrastructure put in place and personnel hired. The impact and effectiveness of this will not be known for some time, but our actions to date demonstrate our commitment to achieve the goals of the Anti-Corruption Strategy.

In 2019 we will start to examine the effect of our actions to date with a focus on how to best achieve real world impact. Priorities include:

**Prosperity** – We will press the case that combatting corruption is critical to a nation's prosperity by raising international standards for business integrity and improving our service offer to UK businesses that wish to abide by our laws and conduct clean business in challenging markets. This will include continued development of the Business Integrity Hub and finalising our approach to free trade agreements. We will harness the newly launched £45m Prosperity Fund Global Anti-Corruption programme to promote change internationally.

**Illicit finance and beneficial ownership** – We will increase our efforts to ensure that the UK's financial sector is increasingly hostile to illicit finances and promote international action through, amongst other things, our beneficial ownership and illicit finance campaigns. We will support the UK Overseas Territories and Crown Dependencies in their efforts to do the same.

**Strengthening the evidence base for anti-corruption** – We will pursue a body of work on better understanding the threat posed by economic crime, including both international and domestic corruption. This will map our current understanding of the corruption threat by bringing together the evidence in government, civil society and academic





literature. There is related work to develop a common cross Government working definition of "corruption" by focusing on sub-categories (eg bribery, fraud, embezzlement etc). This will help address under-reporting of corruption threats and develop a better picture of the threat while helping steer prioritisation and resourcing decisions.






**Insider threat** – We will progress the work we have done in 2018 on securing a more joined up and strategic approach to tackling corruption in critical domestic public sectors (prisons, borders, policing, defence and local government). This is another area where the analysis of the problem and the evidence base for how to tackle it needs to be further developed.

**International partnership** – Recognising that the UK cannot tackle corruption on its own and that creating a level playing field needs international cooperation and coordination, we will continue to work with our international partners, including through the international fora, through bilateral action, through the Prosperity Fund initiatives and in our support of civil society initiatives. This will contribute to global efforts to improve transparency and infrastructure to better combat corruption.

# Annex

## Progress Tracker Commitments in the UK Anti-Corruption Strategy

	On track or completed
	Progressing with risk that deadline(s) may be missed and/or with some risk to delivery
	Off track with deadline(s) expected to be missed and/or with serious risk to delivery
	Not yet started

Priority Area 1: Reduce the insider threat in high risk domestic sectors				
Goal 1 – Reduce vulnerability to corrupt insiders in four critical sectors				
No.	Commitment	Department / Agency	Status	Comment
1.1	Implement a comprehensive programme of work to understand, manage and mitigate the vulnerabilities that could be exploited by corrupt insiders at UK airports, maritime ports and international rail terminals (UK Ports).	Home Office		Programme of work agreed across government.
1.2	Develop a new anti-corruption strategy for prisons and probation in England and Wales in 2017, to ensure our aims and approach meet the nature of the current threat and will inform a range of future work to address vulnerabilities.	Ministry of Justice		New anti-corruption strategy devised in 2017. Ongoing implementation work underway.
1.3	Increase transparency and improve accountability in policing.	Home Office		Ongoing commitment. Programme of work ongoing.
1.4	Publish by the end of 2017 new professional guidance and Codes of Practice on Vetting requirements for individuals serving in policing (College of Policing).	Home Office		Completed. Code of Practice on Vetting published in October 2017.
1.5	Strengthen protections for police whistle-blowers by implementing reforms included in the Policing and Crime Act 2017 and amending regulations in 2019.	Home Office		Amendments to regulations expected in 2019.

### Priority Area 1: Reduce the insider threat in high risk domestic sectors

1.6	Implement the national strategy for preventing and addressing abuse of position by police personnel for sexual gain (National Police Chief's Council), and new College of Policing guidance on maintaining professional boundaries across all police forces throughout 2017/18.	Home Office		Completed. National strategy implemented.
1.7	Reform the Independent Police Complaints Commission, which will be known from 2018 as the Independent Office for Police Conduct (IOPC) through: a. reformed corporate governance and a single line of accountability for investigations, enabling the organisation to deliver more investigations into serious allegations.	Home Office		Completed. Regulations reforming the IOPC came into force in January 2018.
1.8	Undertake increased joint working between the Ministry of Defence, national law enforcement and police partners to further enhance coordination of intelligence-led operations against high priority corruption targets, in order to increase deterrence, disruption and detection.	Ministry of Defence		Single entry point in the MOD increasing joint working with law enforcement partners.
1.9	Deliver a programme of work to address the vulnerability posed by corrupt employees in the defence sector to inform future policy and put in place appropriate measures to mitigate the threat.	Ministry of Defence		MOD has developed a security fundamentals learning package covering a range of security issues facing Defence staff, including insider threat.

### Goal 2 – Increased awareness of the insider threat across sectors

1.10	Provide good practice advice on personnel security and tackling the insider threat to organisations that comprise the critical national infrastructure. We will prioritise organisations based on the careful analysis of national security threats and will work closely with a range of partners including the relevant lead government departments, the Centre for the Protection of National Infrastructure (CPNI), and the National Cyber Security Centre.	Centre for Protection of National Infrastructure		Ongoing commitment. Being delivered by CPNI.
1.11	Consider the findings of the Law Commission Review of the Misconduct in Public Office offence, when published, and set out a government response to the recommendations for reform of common law offence.	Home Office		Final recommendations expected early 2019.

### Priority Area 2: Strengthen the integrity of the UK as an international centre

#### Goal 1 – greater transparency over who owns and controls companies and other legal entities

No.	Commitment	Department / Agency	Status	Comment
2.1	Ensure law enforcement can use the information contained in the new People with Significant Control (PSC) register and trusts-with-tax-consequences register effectively. We will strengthen channels for regular dialogue and feedback between law enforcement agencies and Companies House, the holders of the PSC register.	Business, Energy and Industrial Strategy		Ongoing commitment. Being delivered through Companies House which, as part of the cross-government intelligence network, actively reaches out to raise awareness of the data it can offer.

**Priority Area 2: Strengthen the integrity of the UK as an international centre**

2.2	Publish a draft bill in this session of parliament for the establishment of a public register of beneficial ownership of overseas legal entities. It will require them to provide this information when they own or purchase property in the UK or are participating in central government contracts. It will identify, in a public and easily accessible way, the owners and controllers of overseas legal entities that own property in the UK, increasing transparency and trust in the UK property market and supporting law enforcement in their investigations.	Business, Energy and Industrial Strategy		Bill was published in draft in July 2018 and subject to pre-legislative scrutiny. Existing transparency mechanisms (rather than the register established by the Bill), will be used to publish beneficial ownership information for foreign companies winning government contracts.
2.3	Encourage others to establish similar beneficial ownership registers, and work with the UK's Overseas Territories and Crown Dependencies as they implement their commitments under the 2016 arrangements.	Home Office, Foreign and Commonwealth Office		A review of existing arrangements undertaken in Spring 2018 and a Written Ministerial Statement was issued in May 2018.
2.4	Carry out a statutory review of the implementation of the 2016 bilateral company beneficial ownership arrangements with our Overseas Territories and Crown Dependencies for the period ending December 2018. This will assess whether the new arrangements have been effective – in particular whether they have resulted in improved law enforcement outcomes – and to consider if these need to be strengthened further.	Home Office, Foreign and Commonwealth Office		Statutory review is due to be undertaken after December 2018.
2.5	Continue to work with the OECD Global Forum, and the Financial Action Task Force on the implementation of international standards and the availability of beneficial ownership information in the domestic and cross border context.	Home Office, HM Treasury		Being delivered through the international beneficial ownership campaign launched at the International Anti-Corruption Conference in Copenhagen in October 2018.

**Goal 2 – stronger law enforcement, prosecutorial and criminal justice action**

2.6	Establish a new Minister for Economic Crime in the Home Office.	Home Office		Completed. Ben Wallace appointed Minister of State for Security and Economic Crime in December 2017.
2.7	Introduce a new Ministerial Economic Crime Strategic Board, chaired by the Home Secretary, to oversee strategic priorities, overall performance and align funding and capability development on economic crime.	Home Office		The Ministerial Economic Crime Strategic Board is due to meet early in 2019 and will be jointly chaired by the Home Secretary and the Chancellor.
2.8	Establish a National Economic Crime Centre, based in the National Crime Agency, with staff from across government and the private sector to: improve the intelligence picture on economic crime; task and coordinate the overall law enforcement response; and increase the UK's ability to investigate high-end economic crime.	Home Office		Initial capabilities of the National Economic Crime Centre started on the 31 October 2018.
2.9	Implement all key elements of the Criminal Finances Act, including Unexplained Wealth Orders, by the end of April 2018 (subject to parliamentary time).	Home Office		The Criminal Finances Act came into effect in 2018 for all parts of the UK except Northern Ireland.



**Priority Area 2: Strengthen the integrity of the UK as an international centre**

2.10	Work with partners to strengthen cooperation with international partners on recovering criminal assets, building on the first meeting of the Global Forum for Asset Recovery in December 2017.	Home Office		Ongoing commitment. Being delivered by the Asset Recovery Action Plan to be published in 2019.
2.11	Work with partners to ensure the newly established International Anti-Corruption Co-ordination Centre becomes a valued and effective resource for law enforcement agencies investigating allegations of grand corruption.	National Crime Agency		Ongoing commitment. IACCC continues to work with international partners to progress investigations.
2.12	Strengthen our ability to investigate tax evasion and other economic crime, using the multi-agency Joint Financial Analysis Centre to gather data, develop intelligence and conduct analysis.	National Crime Agency		Being delivered through JFAC which acquires and assesses data and disseminates intelligence reports to support investigations.
2.13	Amend Schedule 3 of the Crime and Courts Act to add the SFO to the list of organisations the Director General of the NCA can directly task to investigate a case of economic crime.	Home Office		Due to restrictions on Parliamentary time, this order <sup>9</sup> has been postponed until 2019.
2.14	Consider the findings of the Call For Evidence that in January 2017 proposed extending corporate criminal liability beyond bribery and tax evasion to wider economic crimes. If appropriate we will consult on how new offences might be introduced.	Ministry of Justice		Work is continuing on analysis of the evidence and future options. Findings to be published in 2019.
2.15	Continue to support the Office of Financial Sanctions Implementation (OFSI) in imposing monetary penalties for financial sanctions breaches, following the publication of guidance on how they will be used.	HM Treasury		OFSI is actively investigating a number of cases which may result in penalties in the current financial year.
2.16	Increase industry and general public awareness of financial sanctions to prevent breaches; including awareness of industry's reporting obligations to OFSI.	HM Treasury		OFSI has engaged with a wide variety of sectors at numerous events, roundtables and meetings. It has published sector specific guidance and worked closely with regulators and industry to raise awareness and promote compliance.
2.17	Continue to assess the effectiveness of financial sanctions to prevent breaches, including awareness of industry's reporting obligations to OFSI.	HM Treasury		An assessment of the UK's effectiveness in financial sanctions (specifically related to counter-proliferation and terrorist-asset freezing) formed part of the UK's Mutual Evaluation Review by the Financial Action Task Force (FATF). This will be published in Q4 of 2018.
2.18	Strengthen law enforcement capacity and capability by implementing an innovative counter bribery and corruption training programme from December 2017. The City of London Police Economic Crime Academy is already providing a new programme to develop investigators' skills in law enforcement agencies in the UK and overseas.	City of London Police		Delivered through the City of London Police Learning Programme.

<sup>9</sup> This order will add the SFO to the list of organisations that the Director of the NCA can directly task to "perform a specific task"

## Priority Area 2: Strengthen the integrity of the UK as an international centre

### Goal 3 – further enhanced anti-money laundering and counter-terrorist financing capability

2.19	Work with supervisors to fully embed the new Money Laundering Regulations that were introduced in June 2017, which give effect to the revised FATF standards and transpose the 4th EU Money Laundering Directive. These regulations require firms to apply enhanced due diligence to all politically exposed persons (PEPs) on a risk-sensitive basis, and are complemented by guidance published by the Financial Conduct Authority (FCA) in July 2017 which clarifies the risk based approach that firms should take in their treatment of PEPs.	HM Treasury		<p>Deliverables in 2018 include working with supervisors to invest more resources in their AML compliance function; collaborating to develop a shared understanding of risk, and risk-based supervision; and developing stronger links with NCA and the Finance Intelligence Unit.</p> <p>HM Treasury has approved sectoral guidance which clarifies how regulated firms should comply with the Money Laundering Regulations 2017. This guidance aligns with that published by the FCA in relation to the risk-based approach to be followed in identifying and applying due diligence measures to PEPs.</p>
2.20	Create a new Office for Professional Body Anti-Money Laundering Supervision (OPBAS), hosted by the Financial Conduct Authority (FCA), to help and ensure that professional body AML supervisors implement their supervisory obligations to a consistently high standard, and work across the regime to share best practice and facilitate the flow of information with law enforcement. OPBAS will be fully operational by the beginning of 2018.	Financial Conduct Authority		OPBAS fully operational from January 2018.

### Goal 4 – stronger public-private partnerships, to share information and improve targeting of those who pose greatest risk

2.21	Increase the analytical capability of the Joint Money Laundering Intelligence Taskforce, and continue to expand its membership to include more banks and other financial services firms.	National Crime Agency		Ongoing commitment. Being delivered through JMLIT.
2.22	Continue to strengthen our response to international illicit financial flows and money laundering, working with other jurisdictions to encourage them to establish or enhance public-private information sharing partnerships, and to share best practice. We will also work together to improve information sharing between national public-private partnerships, including through the UK's membership of the FATF.	Home Office		Ongoing commitment. Being delivered through the international illicit finance campaign.
2.23	Build upon the success of the Joint Fraud Taskforce to tackle volume fraud. This includes improving the law enforcement response to fraud at the local, regional and national levels, including better utilisation of industry data to tackle the most prevalent fraudsters.	Home Office		Ongoing commitment. To be delivered through a refocused JFT. First HMICFRS thematic inspection on fraud report due early 2019.
2.24	Reform the Suspicious Activity Reports regime, upgrading capabilities (including IT) and making the necessary legislative, operational and technical changes.	Home Office		Ongoing commitment. Work in progress to devise a three to five year programme.

## Priority Area 2: Strengthen the integrity of the UK as an international centre

2.25	Deliver prevention campaigns to professionals in the regulated sector to raise awareness of money laundering risks and the actions to mitigate them in 2017-18, in the context of our risk-based and proportionate regulatory regime. We will report on the reach of these campaigns and their impact, for example self-reported behavioural shifts in response.	Home Office		Being delivered through the Flag it Up campaign.
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## Priority Area 3: Promote integrity across the public and private sector

### Goal 1 – Greater public sector resilience against the threat of corruption

3.1	In the next two years, establish a Counter-Fraud and Corruption Profession across the Civil Service, based on professional standards and competencies that include bribery and corruption.	Cabinet Office		Profession launched in October 2018.
3.2	Assign a senior lead in every central government department for bribery and corruption, who is a trained and qualified member of the Civil Service Counter Fraud Profession.	Cabinet Office		Work programme due to begin in financial year 2019/20.
3.3	Include in the government's Counter Fraud Functional Standards counter corruption standards that all departments will follow.	Cabinet Office		Completed. Standards launched in October 2018.
3.4	Publish details of the amount of fraud and corruption detected every year in central government and, alongside this, the details of which departments are following the Counter Fraud and Corruption Functional Standards.	Cabinet Office		Ongoing commitment. Next annual Fraud Landscape Report due to be published by December 2018. Levels of reported corruption and uptake of new standards will be reported in financial year 2019/20.
3.5	Encourage councils to take part in new joint investigative working arrangements between the Department for Work and Pensions and local authority investigators on benefit fraud and related local government frauds.	Ministry of Housing, Communities and Local Government		Phased rollout of the project began in October 2018.
3.6	Introduce a number of pilot schemes at local government elections in 2018 (working with key partner organisations, including the Electoral Commission and the Association of Electoral Administrators), to test the impact of asking voters to present certain forms of photographic and non-photographic identification. This was a recommendation in Sir Eric Pickles 2016 review into electoral fraud.	Cabinet Office		Pilots held during local elections in May 2018.

### Priority Area 3: Promote integrity across the public and private sector

#### Goal 2 – A more open government that is trusted by citizens, with robust protections for whistle-blowers

3.7	Implement a revised Freedom of Information Act Code of Practice in Spring 2018 (an Open Government Partnership UK National Action Plan commitment).	Cabinet Office		Completed. Revised Code of Practice published in July 2018.
3.8	Actively engage with the 2017 Council of Europe Group of States against Corruption (GRECO) evaluation of the UK. We are the first country to undergo a GRECO evaluation on prevention of corruption in the highest levels of government and law enforcement agencies. We will use the findings to compare the UK's propriety and ethics standards against other countries and assess the mechanisms in UK law enforcement agencies to prevent internal corruption. The UK Government will publish GRECO's recommendations and details of the actions we take in response.	Ministry of Justice		Evaluation Report published in May 2018. Situation report on compliance with the recommendations due by end of June 2019.
3.9	Review in 2017-18 the effectiveness of BEIS' Whistleblowing Guidance for Employers and Code of Practice. This aims to ensure that more employers follow good practice when responding to disclosures relating to whistleblowing.	Business, Energy and Industrial Strategy		Review completed in May 2018 but the response rate from business was insufficient to reach conclusions. This review will now be included in the wider 2018/19 review of the changes to the whistleblowing framework as introduced by the Enterprise and Regulatory Reform Act 2013.
3.10	Review in 2018/19 the recent changes to the whistleblowing framework, as introduced by the Enterprise and Regulatory Reform Act 2013.	Business, Energy and Industrial Strategy		Consultations targeted at key industry professionals will commence by the end of 2019.
3.11	Implement legislation to provide protection to whistle-blowers making job applications in the health sector and in children's social care at the earliest opportunity.	Business, Energy and Industrial Strategy		Relevant provisions in the Employment Rights Act 1996 brought into force in May 2018. Provisions in the Children and Social Work Act 2017 being considered.

#### Goal 3 – Strengthened UK private sector of integrity

3.12	Investigate weaknesses in our business frameworks if they arise, and take action where necessary. For example, in March 2017 the government completed a call for evidence on the use of limited partnerships, in response to concerns that they may be vulnerable to misuse. The government is actively considering options and will announce next steps soon.	Business, Energy and Industrial Strategy		Ongoing commitment. A 12-week consultation on the reform of limited partnership law closed in July 2018. The Government published its response on 10 December 2018.
3.13	As the Financial Reporting Council updates its Guidance on the Strategic Report (incorporating changes arising from the UK implementation of the EU Directive on Non-financial reporting), include guidance for disclosures on anti-corruption and bribery.	Business, Energy and Industrial Strategy		Completed. Updated guidance published in July 2018.
3.14	Publish the results of the government's review of the Security Industry Authority (SIA), to examine whether the SIA continues to meet the recognised principles of good corporate governance. The possible regulation of private investigators was included in the scope of the review.	Home Office		Review published in June 2018 and its recommendations are being considered by Ministers.

### Priority Area 3: Promote integrity across the public and private sector

#### Goal 4 – Greater integrity in domestic and international sport

3.15	Implement the provisions in the cross-government Sport Strategy, Sporting Future, to protect the integrity of sport.	Department of Digital, Culture, Media and Sport		Ongoing commitment. Provisions are being implemented by DCMS.
3.16	Undertake a tailored review of UK Anti-Doping to assess how it is placed to respond to future anti-doping challenges, and will report in 2018.	Department of Digital, Culture, Media and Sport		Review published in 2018.
3.17	Sign the Council of Europe Convention on the Manipulation of Sports Competitions in 2018.	Department of Digital, Culture, Media and Sport		Completed. Convention signed in December 2018.
3.18	Continue to support the International Partnership Against Corruption in Sport, and host a meeting in 2018.	Department of Digital, Culture, Media and Sport		Ongoing commitment and UK hosted IPACS meeting in December 2018.

### Priority Area 4: Reduce corruption in public procurement and grants

#### Goal 1 – Greater procurement transparency, enabling better identification and mitigation of corruption risks, market distortion and anti-competitive behaviour

4.1	Undertake a review of procurement risks in local government by the end of 2018. This will be led by the Secretary of State for the Department of Communities and Local Government in collaboration with the Prime Minister's Anti-Corruption Champion.	Ministry of Housing, Communities and Local Government		Review began September 2018 and due to report summer 2019.
4.2	Take steps to ensure publication of contract award notices as required by the Public Contracts Regulations 2015. This will include the Crown Commercial Service formally reminding contracting authorities of their obligation to publish these in Contracts Finder and the Official Journal of the European Union by January 2018.	Crown Commercial Service		Procurement Policy Note issued.
4.3	Work with international partners, through the Contracting 5 to establish a joint working group and implement a detailed work plan.	Cabinet Office		Joint Working Group established in December 2017.
4.4	Explore ways to deliver a more collaborative approach in the Ministry of Defence's supply chain, with the aim of entrenching a strong anti-corruption culture. This will include hosting a conference with key suppliers in 2017 to identify opportunities for closer anti-corruption working.	Ministry of Defence		Ongoing commitment. Conference held in December 2017 and further conference (co-hosted with NATO) held in April 2018. Work plan on outcomes of conferences being developed.

**Priority Area 4: Reduce corruption in public procurement and grants**

4.5	Use UK Government Digital expertise to support the digital transformation of government procurement services in four countries. These countries will draw on the UK's experience in establishing the Digital Market Place (an online platform that all public sector organisations can use to find and buy cloud-based services).	Cabinet Office		Ongoing commitment. Being delivered as part of the £45m Prosperity Fund Global Anti-Corruption Programme.
<b>Goal 2 – Strengthened awareness and capability within contracting authorities.</b>				
4.6	Identify organisations and businesses under contract or receiving grants in open data releases using reusable unique identifiers, by default. We will do this by starting to use common data labels (termed unique identifiers). These already exist for many types of entity (for example, company number or charity number) and increasing their use will enable users of open data to identify entities within and across data sets.	Cabinet Office		Ongoing commitment. Deliverables in 2018 include exploration of unique identifiers on government grants data, publication of grants data to open data standards and rolling out of data visualisation dashboard.
4.7	Help procurers detect and deter illegal bid rigging by increasing the uptake of the Competition and Market Authority's (CMA) online training and guidance materials.	Competitions and Market Authority		Ongoing commitment. CMA review of its online training and materials with recommendations expected in 2019.
4.8	Promote use of the CMA's new tool that analyses bid data for signs of suspicious activity, measuring the level of uptake.	Competitions and Market Authority		Ongoing commitment. To follow CMA recommendations in 2019.
4.9	Encourage procurers to investigate and report possible cartels, measuring the number of leads received by CMA.	Competitions and Market Authority		Ongoing commitment. To follow CMA recommendations in 2019.
4.10	Undertake data analytics activity using Random Sampling exercises in some areas of government's commercial activities to actively look for the risk of fraud.	Cabinet Office		Sampling exercises across three strands are underway and due for completion in 2019.
4.11	Encourage local authorities to make better use of the National Fraud Initiative data matching service and associated data matching tools, which enable the identification of potential fraud and corruption.	Ministry of Housing, Communities and Local Government; Cabinet Office		Ongoing commitment. National Fraud Initiative report published in September 2018.
4.12	The Ministry of Defence will explore the use of anti-corruption data analytics to provide assessments across the whole life of the procurement cycle, utilising data-sharing approaches such as the National Fraud Initiative.	Ministry of Defence		Ongoing commitment. Being delivered by MOD ongoing programme of procurement counter-fraud and corruption data analytics.

## Priority Area 4: Reduce corruption in public procurement and grants

### Goal 3 - greater confidence in efficient and legitimate contract management

4.13	Trial the Crown Commercial Service, a new conviction check to complement existing provisions in the Public Contracts Regulations 2015 requiring proof that bidders don't have relevant convictions. This will inform executive decisions, and will start in December 2017.	Crown Commercial Service		Trial completed in June 2018. Findings being reviewed.
4.14	Produce specific guidance to assist procurers to identify and tackle corruption. By February 2018 we will produce and disseminate guidance to government procurers on applying exclusions in the procurement process, managing conflicts of interest and whistleblowing. We will then work to embed this.	Crown Commercial Service		Stakeholder review on draft guidance in progress.
4.15	Oversee the effectiveness of the new NHS Counter Fraud Authority (established in November 2017).	Department of Health and Social Care		First full report on Counter Fraud Authority due in 2019.
4.16	Use the Crown Commercial Service's 'Mystery Shopper' function to investigate cases of poor practice with the relevant contracting authority, and make specific recommendations for future action to help drive better behaviours and improve public sector purchasing.	Crown Commercial Service		Work plan to improve awareness of function being developed. Review found no complaints made through the function in 2018 from suppliers in relation to bribery and corruption.

## Priority Area 5: Improve the business environment globally

### Goal 1 – Reduced impact of corruption on trade and investment internationally

5.1	Support other countries, bilaterally and at multilateral fora, to actively implement international Anti-corruption standards, especially the OECD Anti-Bribery Convention. We will offer support where appropriate to those countries wishing to accede to the convention (including technical assistance and capacity building support).	Foreign and Commonwealth Office; Home Office		On-going commitment. Deliverables for 2018 include the OECD Global Anti-Corruption and Integrity Forum in March 2018 and attending meetings of the OECD Working Group on Bribery.
5.2	Support policy and principles being promoted by the G20 and the G7 that tackle corruption while eliminating market access barriers	Home Office		On-going commitment. Deliverables for 2018 include the G20 High-Level Principles on Preventing Corruption and Ensuring Integrity in State-Owned Enterprises and the joint OECD/G20 Summit in October 2018.
5.3	Consider, as the UK develops its position as an independent trading nation, how transparency and anti-corruption can best be supported through our bilateral and regional trade dialogues and trading agreements.	Department of International Trade		Public consultation on possible free trade agreements (FTAs) with the USA, Australia and New Zealand completed in October 2018. Consultation response will be published in due course.

## Priority Area 5: Improve the business environment globally

5.4	Work in up to 35 countries to support 'ease of doing business' and trade facilitation reforms. This includes capacity building and technical assistance aimed at developing robust legislation and transparency standards, promotion of e-procurement platforms, reducing corruption at ports and border points. This will be delivered through UK government programmes, including through the Prosperity Fund, which makes £1.3 billion available over the next 5 years to promote economic growth in developing countries.	Foreign and Commonwealth Office/ Department for International Development		Being delivered as part of the £45m Prosperity Fund Global Anti-Corruption programme and through DFID country programmes.
<b>Goal 2 – Enhanced international development finance and export finance practices</b>				
5.5	Review CDC's tax policy annually to make sure that it keeps pace with evolving global standards and remains at the forefront of DFI practice. Under its existing tax policy, CDC will only invest in developing countries through jurisdictions that are committed to the implementation of the international standard for automatic exchange of information in tax matters (AEOI), as well as those that have been rated at least "largely compliant" under the Global Forum's assessment of jurisdictions' compliance with the international standard on exchange of information on request (EOIR). The latter will now include, in its next round of jurisdictions' assessments, a requirement to maintain and exchange beneficial ownership information. CDC's tax policy includes a commitment to follow the Global Forum standard as it evolves.	Department for International Development		On-going commitment. Tax policy review took place in June 2018.
5.6	Publish more investment information and encourage other Development Finance Institutions to do the same (CDC).	Department for International Development		On-going commitment. Additional information published in the new CDC website launched in May 2018.
5.7	Ensure that investments are underpinned by world-class due diligence and business integrity practice through a strengthened and expanded CDC internal Business Integrity Unit.	Department for International Development		Business Integrity Unit strengthened and expanded in 2018.
5.8	Continue to work with like-minded countries at the OECD Export Credit Group to promote higher standards of anti-bribery due diligence by OECD export credit agencies as part of a review expected to conclude in 2017 (UKEF).	UK Export Finance		New standards agreed by OECD Export Credits Working Group.
5.9	Establish a dedicated anti-bribery and corruption due diligence team within UKEF to further strengthen existing capability, and review present policies and procedures to identify any further areas for improvement.	UK Export Finance		Recommendations from the UKEF Financial Crime Compliance Project, including the establishment of a dedicated anti-bribery and corruption due diligence team, due for implementation throughout 2018 and 2019.
<b>Goal 3 – Increased investment with integrity by UK companies in challenging overseas markets</b>				
5.10	Ensure that DIT communications, relevant campaigns and other economic diplomacy initiatives highlight the commercial and reputational advantage of trading with integrity.	Department of International Trade		Ongoing commitment. Delivered through DIT campaigns which reinforce the competitive advantage the UK gains through a secure and trustworthy trading and business environment.



### Priority Area 5: Improve the business environment globally

5.11	Strengthen the support that is available to companies, building on the services and guidance already offered through government digital platforms. We will work with industry and trade associations to develop initiatives tailored to the needs of UK exporters, including small and medium enterprises and investors.	Department of International Trade; Department for International Development		Being delivered through the Business Integrity Initiative.
5.12	Produce digital content for the GREAT. GOV.UK digital platform to ensure information on trading with integrity is available and tailored to exporters' needs.	Department of International Trade		Completed.
5.13	As part of the ongoing Foreign and Commonwealth Office economic diplomacy and law enforcement efforts, provide training and resources that improve the awareness and understanding of corruption amongst UK embassy staff. This will include up-to-date guidance on how to report offences under the UK Bribery Act to law enforcement and guidance on how to promote standards of trade integrity.	Foreign and Commonwealth Office		Being delivered by the FCO via its Diplomatic Academy
<b>Goal 4 – Strengthened business-led collective action to reduce corruption</b>				
5.14	Contribute to increased inward investment by supporting business-led initiatives aimed at strengthening anticorruption good practice/approaches, including initiatives that build on the Professional Services Leaders Statement in Support of the London Anti-Corruption Summit, such as those promoted by the Professionals against Corruption.	Home Office		Not yet started. Scoping work to commence in 2019.
5.15	Support collective action, including promoting business-to-business initiatives, action to strengthen supply chains, or to increase transparency, including sponsoring relevant 'Business 20' initiatives at the G20 Anti-Corruption Working Group.	Home Office		Initial forum with UK Finance and the International Chamber of Commerce held in March 2018. The UK did not formally sponsor Business 20 initiatives in 2018 but engaged with the B20 at G20 Anti-Corruption Working Group meetings in February, June and October.
5.16	Work with industry bodies to facilitate the dissemination of the guidance for SMEs as highlighted in the OECD UK Phase 4 Review. This will also address the recommendations offered by the OECD in that review regarding sufficient dissemination of guidance on compliance procedures.	Department of International Trade		Being delivered through the Business Integrity Initiative.
5.17	Work with UK business to identify and address specific corruption risks in target markets and sectors, including with reference to the priorities identified in the UK Industrial Strategy.	Home Office		Not yet started. Scoping work to commence in 2019.
5.18	Encourage other countries to establish reporting mechanisms for high value tender processes, building on the experience of Colombia, Ukraine and Panama.	Cabinet Office		Being delivered as part of the £45m Prosperity Fund Global Anti-Corruption Programme and through DFID country programmes.

**Priority Area 6: Work with other countries to combat corruption**

**Goal 1 – enhanced international transparency, especially in beneficial ownership; extractives, public finance and contracting**

6.1	Enhance global standards of extractives transparency, including project-level reporting. We will continue to champion the EITI domestically, and will support developing countries to comply with the EITI Standard, including its requirement to include beneficial ownership disclosure by 2020. Building on our early compliance with EU Accounting Directive requirements for mandatory extractives reporting in 2018 we will complete a post-implementation review of the 2014 Reports on Payments to Governments Regulations.	Department for International Development		Ongoing commitment is being delivered through support to EITI.
6.2	Work with like-minded partners to strengthen transparency in the sale by producer governments of oil, gas and minerals by the end of 2018 (an Open Government Partnership UK National Action Plan commitment).	Department for International Development		Being delivered through work with international Thematic Dialogue on Commodity Trading Transparency and the OECD Development Centre.
6.3	Support 15 developing countries to make a measurable improvement in their level of fiscal transparency, accountability and citizen participation by 2020 (as measured by the Open Budget Survey scores).	Department for International Development		Ongoing commitment being delivered through our support to the International Budget Partnership.
6.4	Complete pilots in Ghana and Pakistan to introduce the Common Reporting Standard (CRS), the international standard for the automatic exchange of financial account information, and continue to support capacity building in developing countries through a dedicated unit in HMRC, through the Global Forum, and through the Global Forum's Africa Initiative.	Department for International Development		Ongoing commitment. Pakistan has successfully completed pilot on Common Reporting Standards. Similar work is progressing in Ghana.
6.5	Support 16 countries to implement more open contracting in public procurement by 2020. We will encourage more countries to commit to openness across the contracting cycle, from planning to tender, award, contract and implementation.	Department for International Development		Ongoing commitment being delivered as part of the £45 million Prosperity Fund Global Anti-Corruption Programme.
6.6	Support countries to implement their commitments on company beneficial ownership transparency – such as by establishing national beneficial ownership registers or by subscribing to the Open Ownership Register (a global register which the UK has already supported) in the period up to 2020.	Department for International Development		Ongoing commitment being delivered through support of Open Ownership.
6.7	Assist and encourage countries to implement a requirement for beneficial ownership disclosure in their public procurement, so that they have working systems in place by 2020.	Home Office		Not yet started. Scoping work to commence in 2019.

**Goal 2 – reduced levels of corruption in partner countries**

6.8	Pilot a strengthened 'whole of UK Government' strategic approach to anti-corruption in selected countries by December 2018.	Home Office		Now being delivered through the International Illicit Finances Campaign.
6.9	Develop new practitioner partnerships on institution integrity, sharing the best of the UK's professional expertise and strong institutions with developing countries.	Department for International Development		Ongoing commitment being delivered through the DFID Partnerships for Development programme.

Priority Area 6: Work with other countries to combat corruption				
6.10	Publish our new principles governing compensation to overseas victims of corruption and other economic crime by December 2017, and apply these principles to all relevant cases. We will support countries to deliver their commitment to develop their own principles and continue to raise awareness internationally with the aim of achieving a consensus that overseas victims should benefit from the positive outcomes of bribery and corruption cases.	Serious Fraud Office		Principles published in June 2018.
6.11	Provide funding to support the design and initial operations of a Centre of FIU Excellence and Leadership under the Egmont Group, the global representative body of Financial Intelligence Units. The centre, to be operational by March 2018, will improve the ability of member countries to identify and address possible corruption and money laundering. This will help reduce the damage caused by losses of illicitly acquired funds from developing countries.	Department for International Development		The Centre was opened in April 2018.
6.12	Support the initiative being led by UN Office on Drugs and Crime, Switzerland, and Ethiopia to agree international guidelines for the return of stolen assets.	Department for International Development		Ongoing programme of work, such as co-hosting the 2017 Global Forum on Asset Recovery.
Goal 3 - Enhanced action to reduce corruption in fragile and conflicted affected states				
6.13	Establish in the UK a Building Integrity Centre of Excellence to the NATO recognised standard by the end of March 2019 to help strengthen the understanding of how corruption and organised crime fuel instability and conflict through analysis and research that contributes to our work in priority countries. We will reflect this in future training and education programmes.	Ministry of Defence		On track to establish Initial Operating Capability of Building Integrity Centre of Excellence by March 2019.
6.14	Promote greater defence sector transparency through domestic reform in up to four countries, as well as internationally, through support to Transparency International's Defence and Security programme.	Department for International Development		Ongoing commitment delivered through support of Transparency International Defence & Security programme.
6.15	Promote stronger capabilities to combat corruption in the defence and security sectors in five partner countries or regions by 2019 and support the development of regional Building Integrity centres of excellence in Jordan, Ukraine and Western Balkans.	Ministry of Defence		On track for completion by 2019. Programme of work ongoing in Afghanistan, Colombia, Ukraine and Occupied Palestine Territories.
How we will deliver the vision				
Improving our understanding of corruption				
7.1	Provide a clearer picture of domestic corruption in specific areas by working with experts to expand and improve the evidence base on corruption and its impacts.	Home Office		Home Office in process of recruiting personnel to work on building evidence base in 2019.
7.2	Review the corruption threat in relation to serious and organised crime as part of the annual NCA National Strategic Assessment of Serious and Organised Crime.	National Crime Agency, Home Office		Strategic Assessment published in May 2018 and included a section on corruption as a cross-cutting enabler of serious and organised crime.
7.3	Improve how corruption is reported in national crime recording.	Home Office		Ongoing commitment. Data published for the first time in October 2018.

Priority Area 6: Work with other countries to combat corruption				
7.4	Launch a new initiative to provide a reporting mechanism for allegations of bribery and corruption	Home Office		Ongoing commitment. Scoping work undertaken in 2018.
7.5	Improve the quality and breadth of relevant anti-corruption related open data releases by government – this may include drawing on international open data projects such as the Open Data Charter Anti-Corruption Open Up Guide.	Department of Digital, Culture, Media and Sport		Ongoing commitment. Being delivered through the Open Government Partnership National Action Plan 2018-2020.
7.6	Work with four countries to implement a new 'Mobilising data for anti-corruption' programme – which will strengthen collaboration between law enforcement, private sector, civil society and media to improve the quality and use of data in corruption cases.	Department for International Development		2018 procurement exercise to secure implementation partners for the programme is complete. Implementation of the programme to begin in 2019.
7.7	Strengthen UK reporting on UN Sustainable Development Goal targets 16.4 and 16.5 (which include commitments to reduce illegal financial flows and to reduce corruption and bribery).	Home Office, Cabinet Office		Scoping work has begun for the voluntary review of the UN Sustainable Development Goal targets.
7.8	Partner with the World Bank to help other countries measure and report their anti-corruption efforts for the UN Sustainable Development Goals.	Department for International Development		DfID is reviewing its approach to helping other countries measure and report their anti-corruption efforts. A decision will be made in 2019.
7.9	Support further IMF research into the costs and effective ways of tackling corruption, by providing three years of funding from April 2017.	Department for International Development		Funding provided to IMF. Research is underway.
7.10	Commission new research under the DFID Anti-Corruption Evidence Programme, including work to explore the impact of beneficial ownership measures, new forms of commodity based money laundering, and trade and procurement.	Department for International Development		Ongoing commitment. Call for research proposals held in 2018.
7.11	Support action research in four countries on how behavioural sciences approaches can be used to identify and stop corruption in supply chains and in public service.	Foreign and Commonwealth Office		Being delivered through the Prosperity Fund Global Anti-Corruption Programme.
<b>Working Together</b>				
8.1	Engage in regular, problem-focused policy dialogue with relevant stakeholders, using both formal and informal means.	Home Office		Ongoing commitment. Deliverables for 2018 include engagement with civil society, national and international stakeholders and through engagement through the PM's Anti-Corruption Champion.
8.2	Implement the commitments to strengthened public-private partnership and information sharing in anti-money laundering (set out in Section 3.2).	Home Office		Being delivered in relation to SARs and JMLIT.
8.3	Honour our Open Government Partnership commitments through close collaboration with civil society and the private sector.	DDCMS		Being delivered by DDCMS. Government has worked closely with the Open Government Network throughout the development of the 4th National Action Plan.

**Priority Area 6: Work with other countries to combat corruption**

8.4	Strengthen outreach to companies to strengthen integrity in business (as set out in section 3.5).	Home Office; Department of International Trade; Department for International Development		Being delivered through the Business Integrity Initiative.
8.5	Support civil society in developing countries to champion anti-corruption and accountability issues and to participate in relevant international fora, such as United Nations.	Home Office; Foreign and Commonwealth Office; Department for International Development		Ongoing commitment. Being delivered through civil society engagement and representation at international fora.
8.6	Engage with leading researchers, businesses and civil society to strengthen the linkages between evidence and policy (as set out in section 4.1).	Home Office		Ongoing commitment. DfID Ministerial Roundtable held in Spring 2018.
8.7	Review options to develop and promote innovative approaches to combatting corruption and consider how to support this going forward.	Home Office		Ongoing commitment. Being delivered through initiatives such as the Leadership Centre at the Egmont Group.
<b>Promoting International Standards and Partnerships</b>				
9.1	Actively engage in 2017/18 with the formal reviews of the UK under the UN Convention Against Corruption, the Council of Europe, and the Financial Action Task Force.	Home Office		GRECO and FATF Reviews completed. UNCAC Review due for publication in spring 2019.
9.2	Work with successive G20 Anti-Corruption Working Group co-Chairs and G7 Presidencies to support G7 and G20 anti-corruption work streams, including on public and private sector integrity, beneficial ownership, multilateral initiatives and capacity building.	Home Office		Ongoing commitment. 2018 deliverables include two sets of high level principles on integrity in state owned enterprises and on managing conflicts of interest, and an ACWG Action Plan for 2019-21.
9.3	Work through the G20 to encourage participation in the International Partnership Against Corruption in Sport.	Home Office; Department of Culture, Media and Sport		Ongoing commitment. Host of IPACS meeting in December 2018.
9.4	Increase the number of anti-corruption commitments in Open Government Partnership national action plans working through the OGP's Anti-Corruption Working Group.	DDCMS/DFID		In 2018 the UK committed £12 million to scale up OGP National Action Plan delivery.
9.5	Consider the findings of the OECD Phase 4 evaluation on the UK's implementation of the OECD Anti-Bribery Convention.	Home Office		Year 2 update to OECD on Phase 4 Evaluation in March 2019.

**Priority Area 6: Work with other countries to combat corruption**

9.6	Promote the implementation of the UNCAC by supporting the UN Action Plans agreed at the successful UK funded regional meetings in East Africa and South East Asia.	Foreign and Commonwealth Office		Being delivered through the Prosperity Fund Global Anti-Corruption Programme.
9.7	Work with the World Bank to support at least one-third of International Development Association countries to operationalise commitments made as part of their Open Government Partnership agenda – including providing technical assistance and capacity building to enable open contracting and/ or beneficial ownership disclosures, where appropriate.	Department for International Development		In July 2018 the World Bank launched a new multi-donor trust fund to support implementation of the OGP commitments in its client countries. The UK has committed £3.5m to the MDTF, with a further £1.2m conditional on additional donor funding.
9.8	Support the International Monetary Fund to complete a comprehensive review of its governance guidance for staff by end 2017, and to issue updated guidance by mid-2018.	HM Treasury		Completed.
9.9	Work through the UN, Commonwealth, G20, and others to highlight the links between corruption and the Illegal Wildlife Trade as a global concern.	Home Office		Host of international conference on the Illegal Wildlife Trade in 2018.
9.10	Support the Commonwealth Secretariat to promote anti-corruption amongst its membership including at the 2018 Commonwealth Summit meeting in London.	Home Office		Host of event on anti-money laundering and de-risking of banks at the 2018 Commonwealth Summit.
9.11	Strengthen the capacity of the OECD to support members and developing countries to meet international standards on anti-corruption.	Foreign and Commonwealth Office		Ongoing commitment. Being delivered through engagements with OECD Working Group on Bribery and Prosperity Fund Global Anti-Corruption Programme.
<b>Monitoring and Reporting on Progress</b>				
10.1	Publish progress updates on the GOV.UK website.	Home Office		Ongoing commitment. Completed for 2018.
10.2	Provide an annual written update to parliament on progress made under the UK Anti-Corruption Strategy, thereby giving it the opportunity to scrutinise our anti-corruption work.	Home Office		Ongoing commitment. Completed for 2018.

